

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA	:	
	:	Case No: 2:24-mj-470
	:	
v.	:	
	:	
JOSHUA E. BOCK	:	MAGISTRATE JUDGE
	:	

**JOINT MOTION FOR EXTENSION OF TIME DURING WHICH
INDICTMENT/INFORMATION MUST BE FILED**

Now come the parties, through their undersigned attorneys, and move this Court for an order extending the time for the return of an indictment or information, pursuant to 18 U.S.C. § 3161(b), from January 24, 2025 to March 26, 2025. The defendant, Joshua E. Bock is aware of his right to timely filing of an indictment or information, afforded to him under 18 U.S.C. § 3161(b), and hereby waives that right for the purposes of this motion. The parties believe this continuance would best serve the interests of justice and that the time would be excludable pursuant to 18 U.S.C. § 3161(h)(7)(A).

The government provided initial discovery materials to counsel for the defendant and a plea agreement involving the potential of pre-indictment resolution of this matter. The defendant has expressed an interest in maintaining the option of resolving this matter pre-indictment once the government's investigation concludes, and the parties believe such resolution is a possibility. However, given the indictment deadline the parties will be unable to accomplish this before the deadline. The parties have and will continue to exercise due diligence in reaching a prompt resolution of this matter, and are in agreement that an approximately 60-day continuance of the time for indictment would best serve the interests of justice and would not impinge on the

interest of the public in a speedy trial, as pre-trial resolution will conserve significant resources by eliminating the need to expend grand jury and potentially trial jury time. Thus, the time would be excludable pursuant to 18 U.S.C. § 3161(h)(7)(A).

For these reasons, the government, defense counsel and the defendant jointly request an extension of the time within which an indictment or information may be filed in this case until March 26, 2025.

Respectfully submitted,

KENNETH L. PARKER
United States Attorney

Emily Czerniejewski

EMILY CZERNIEJEWSKI (IL 6308829)
Assistant United States Attorney
303 Marconi Boulevard, Suite 200
Columbus, Ohio 43215
(614) 406-3572
Emily.Czerniejewski@usdoj.gov

s/ Stephen Wolfe

STEPHEN THOMAS WOLFE, Esq.
Attorney for Joshua E. Bock
1500 W. 3rd Avenue, Suite 235
Columbus, Ohio 43215
(614) 725-5440
SWolfe@wvwlegal.com